

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of TexasUnited States Courts Southern  
District of Texas  
FILED

12/02/2021

United States of America )

v. )

PEREZ, Mark Anthony )

Case No. C-21-mj-1456 )

Nathan Ochsner, Clerk of Court )

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2, 2021 in the county of Nueces in the  
Southern District of Texas, the defendant(s) violated:

Code Section

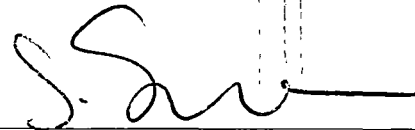
Offense Description

Title 21 USC 841 (a) (1)

Knowingly, intentionally, and unlawfully possessed with the intent to distribute  
a controlled substance listed in Schedule I the Controlled Substance Act of  
1970, to wit: 55 grams (AGW) of methamphetamine.

This criminal complaint is based on these facts:

See attachment A

☒ Continued on the attached sheet.

Complainant's signature

Joshua Sorensen, DEA Task Force Officer

Printed name and title

Submitted by reliable electronic means, sworn to, signature attested telephonically per

Fed.R.Crim.P. 4.1, and probable cause found:

Date: December 2, 2021

Judge's signature

City and state: Corpus Christi, Texas

Mitchel Neurock, United States Magistrate Judge

Printed name and title

Mark Anthony PEREZ

ATTACHMENT "A"

On November 30, 2021, a member of DEA HIDTA Group 1, obtained a Federal Search Warrant, signed by United States Magistrate Judge Julie K. Hampton, for a residence in Corpus Christi, Texas (hereinafter referred to as the Target Residence). Agents previously received information that Mark Anthony PERZ a.k.a. "Coast" resides at the Target Residence and distributes methamphetamine. It should be noted that PEREZ is a high ranking member of the Texas Syndicate prison gang.

On December 2, 2021, members of DEA HIDTA Group 1, ATF, and Corpus Christi Police Department (CCPD) executed said Federal Search Warrant at the Target Residence. Prior to the execution of the search warrant, agents observed PEREZ depart the Target Residence in his Dodge Ram pickup truck (hereinafter referred to as the Target Vehicle). Moments later, CCPD conducted a traffic stop on PEREZ for a traffic violation. Officers and agents explained to PEREZ the Federal Search Warrant was about to be executed at the Target Residence. Agents asked PEREZ, for officer safety reasons, if there were any other individuals inside the Target Residence and/or any items that could harm agents/officers. PEREZ stated he has multiple firearms and narcotics located in his bedroom.

Agents executed the Federal Search at the Target Residence, and recovered approximately 55 grams of methamphetamine, 114 grams of cocaine, 1860 grams of marijuana, and large amount of United States Currency in numerous denominations located in the bedroom belonging to PEREZ. The amount of narcotics located and seized implies the intent to distribute.

Agents also located (4) firearms in the bedroom area belonging to PEREZ. It should be noted that one of the firearms had a serial number removed and another firearm (revolver) was reported stolen out of Corpus Christi, Texas. Additionally, agents located numerous documents addressed to PEREZ that were associated to PEREZ's gang affiliation and membership.

Due to the amount of narcotics seized, TFO Joshua Sorensen contacted AUSA Barbara De Pena who authorized Federal prosecution of PEREZ.



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Joshua Sorensen  
Task Force Officer  
Drug Enforcement Administration

Submitted by reliable electronic means, sworn to, signature attested telephonically per  
Fed.R.Crim.P 4.1., and probable cause found:

Date: December 2, 2021

City and State: Corpus Christi, Texas

A handwritten signature in cursive script, appearing to read "Mitchel Neurock", written over a horizontal line.

Mitchel Neurock, U.S. Magistrate Judge